

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BETTY SINGLETARY,)	
)	
Plaintiff,)	NOTICE OF REMOVAL
)	
v.)	CIVIL ACTION NO.
)	
CACH, LLC,)	
)	
Defendant.)	
)	

DEFENDANT’S NOTICE OF REMOVAL

TO: THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION and

William R. Carlisle
Carlisle Law Firm
319 Resource Parkway
Winder, Georgia 30680

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. Section 1446(a) and (b), the Defendant CACH, LLC hereby removes this case to the United States District Court for the Northern District of Georgia, Atlanta Division based on the following grounds:

1. This action is removable to the United States District Court under 28 U.S.C. Sections 1331 and 1441 on the grounds of federal question jurisdiction, in

that the complaint purports to allege a cause of action under the Fair Debt Collection Practices Act, 15 U.S.C. §1692, *et seq.*

2. Pursuant to 28 U.S.C. Section 1446(b), this Notice of Removal is filed within thirty days after Defendant's receipt of the initial pleading setting forth the claim for relief upon which this action is based.

3. Pursuant to 28 U.S.C. § 1446(a), attached hereto as Exhibit "A" are copies of the following documents, which are all the process, pleadings and orders received for this action: Summons, Complaint, and Service of Process Transmittal.

4. Upon receipt of this Notice, no further action shall be taken in the State Court of Gwinnett County, Georgia.

5. By filing this Notice of Removal, the Defendant demonstrates its consent to the removal of the case to this Court.

This 21st day of October, 2015.

Respectfully submitted,

BEDARD LAW GROUP, P.C.

/s/ Michael K. Chapman

Michael K. Chapman

Georgia Bar No. 322145

John H. Bedard, Jr.

Georgia Bar No. 043473

*Counsel for Defendant,
CACH, LLC*

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
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BETTY SINGLETARY,

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v.

CACH, LLC,

Defendant.

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CIVIL ACTION NO.

CERTIFICATE OF SERVICE

This is to certify that I have this date served a copy of the within and foregoing **Defendant CACH, LLC's Notice of Removal in the United States District Court for the Northern District of Georgia, Atlanta Division**, by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to:

William R. Carlisle
Carlisle Law Firm
319 Resource Parkway
Winder, Georgia 30680

This 21st day of October, 2015.

Respectfully submitted,

BEDARD LAW GROUP, P.C.

/s/ Michael K. Chapman
Michael K. Chapman